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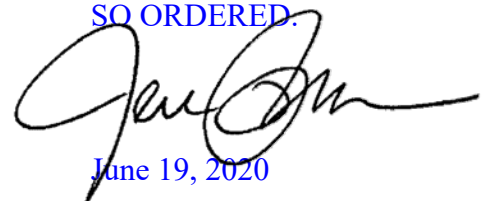
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June 19, 2020

Application GRANTED. The Clerk of Court is
directed to terminate Doc. #150.

VIA ECF

Honorable Jesse M. Furman
United States District Judge for the Southern District of New York
United States Courthouse
40 Centre St.
New York, New York 10007

SO ORDERED.

June 19, 2020

Re: *United States v. Alexander Arguedas, et al. (Davonte Brown)*, 20 Cr. 135 (JMF)

Dear Judge Furman:

I am counsel to defendant Davonte Brown in the above referenced matter. At a telephonic conference on April 30, 2020, confirmed in an Order entered on May 1, the Court granted, in part, the government's motion to revoke my client's bail and for his pretrial detention, but also made a finding that "there is a 'compelling reason' justifying Defendant's 'temporary release' under the existing terms and conditions" pursuant to 18 U.S.C. § 3142(i). The Court directed that Mr. Brown surrender to the United States Marshal at the United States Courthouse at 500 Pearl St., New York, N.Y. by 2 p.m. on June 29, 2020 "unless the Court finds prior to that date — pursuant to a letter motion filed by Defendant — that 'compelling' reasons still exist to extend the Defendant's release." I am writing to request that Your Honor extend the period of temporary release for Mr. Brown through September 1, 2020 because the "compelling reasons" for that temporary release still exist. As Your Honor found as recently as June 8, 2020, in connection with a similar application by co-defendant Jacobb Padin:

Although conditions in New York City have indeed improved, the COVID-19 pandemic remains a grave risk - particularly to those detained in jails and prisons. The Government's argument to the contrary is belied by the restrictions imposed by the Bureau of Prisons at this time (not to mention the small number of tests administered to inmates at the MDC and MCC).

Docket No. 140.

Hon. Jesse M. Furman

June 19, 2020

I have consulted Pretrial Services Officer Joshua Rothman in connection with this motion. He advises me that Mr. Brown has been compliant with the terms of his home incarceration, and that Pretrial Services takes no position on this application. Assistant United States Attorney Andrew Chan advised me that the government opposes the application.

Respectfully submitted,

s/James R. DeVita

James R. DeVita

cc: Assistant United States Attorney Andrew Chan (by ECF)
All counsel (by ECF)
United States Pretrial Services Officer Joshua Rothman (by email)